

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 15 of the)	
Commission's Rules Regarding)	ET Docket No. 99-231
Spread Spectrum Devices)	
)	

Reply Comments of Motorola, Inc.

Motorola, Inc., hereby submits its reply comments in this proceeding. Motorola continues to urge the Commission to move forward with the implementation of the proposal set forth in the Notice of Proposed Rule Making to increase the permissible bandwidth for frequency hopping systems.¹

While the majority of the comments in this proceeding support the wide band frequency-hopping proposal,² a number of comments offer opposition to a change in the frequency hopping rules. Among the reasons for opposition are that the equipment manufactured under the proposed new rules would have performance which is no better than the performance of equipment available under the current rules,³ that the wide band frequency-hopping equipment would not be lower in cost than other equipment⁴, and that

¹ Notice of Proposed Rule Making, _____ FCC Rcd _____, FCC 99-149 (June 24, 1999).

² See Comments of Casio Manufacturing Corporation, Comments of Compaq Computer Corporation, Comments of Ericsson, Inc., Comments of Intel, Comments of Motorola, Inc., and the Comments of Siemens Information and Communication Products, LLC., among others.

³ For example, See Comments of 3Com Corporation at page 2.

⁴ For example, See Comments of Apple Computer, Inc. at page 2, Comments of Harris Semiconductor at page 1.

this change in the rules would result in harmful interference to incumbent Part 15 operations in the 2.4 GHz band.⁵

Of all of these arguments, only the last one should be of concern to the Commission. Whether or not the equipment functions as advertised or is priced appropriately are issues better left to the marketplace to decide. The Commission, however, clearly has the responsibility for managing the spectrum resource and ensuring that no user of the spectrum causes harmful interference to another.

Motorola strongly believes that equipment operating under the proposed new rules for wide band frequency hopping will not introduce “harmful” interference into the 2.4 GHz unlicensed band. Therefore we believe that instituting the proposed change is consistent with maintenance of a Part 15 environment in which devices cause no harmful interference and accept interference from other legal devices.

In order to address in greater detail some of the interference concerns that were raised in comments, Motorola has joined with other interested parties to create a single filing to address those concerns. Motorola was a full participant in the filing of the Committee for Unlicensed Broadband Enablement (“CUBE”) and we, therefore, fully support its conclusions.

Respectfully Submitted

_____/S/_____
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⁵ For example, *See* Comments of 3Com Corporation at page 1, Comments of Harris Semiconductor at page 1.